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Pro Forma Statement of Compliance Against the Information and Advertising Campaign Principles

This form should be cleared at Deputy Secretary (or equivalent) level. The Statement of Compliance should be a standalone document without the need to refer to attachments. The document should include page numbers on every page.

Department:	Department of Education
Campaign name:	2014 Higher education communication campaign

Principle 1: Campaigns should be relevant to government responsibilities

The subject matter of the campaign is directly related to the Government's responsibilities.

It is underpinned by:

- Legislative authority; or
- Appropriation of the Parliament; or
- A Cabinet Decision which is intended to be implemented during the current Parliament

The purpose of the campaign is to:

- inform the public of new, existing or proposed government policies, or policy revisions;
- provide information on government programs or services or revisions to programs or services to which the public are entitled;
- inform consideration of issues;
- disseminate scientific, medical or health and safety information; or
- provide information on the performance of government to facilitate accountability to the public.

Please provide a statement against the relevant points to demonstrate and justify compliance with Principle 1.

1. On 28 October 2014, _____ agreed to fund a \$14.6 million mass media communication campaign to:
 - a. increase target audience awareness and understanding of current Government assistance, resources and financial support for higher education
 - b. counter myths and misconceptions about higher education and the prospective reforms announced in the 2014-15 Budget
 - c. encourage audiences to seek further information about current Government resources, assistance and financial support for higher education, and
 - d. set the scene for the reforms.

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2. The campaign is planned in two phases. Phase one addresses the myths and misconceptions about the current higher education system and promotes financial assistance currently offered by the Australian Government, and which will continue into the future. This includes the Higher Education Loan Programme, or HECS as it is more commonly known.
3. The *Higher Education Support Act 2003* provides for the Australian Government to give financial support for higher education and some vocational education and training through:
 - a. grants and other payments made largely to higher education providers, and
 - b. financial assistance to students (usually in the form of loans).
4. The Act makes clear the Australian Government's role in subsidising Commonwealth Supported Places at higher education institutions, and in supporting students by providing low interest study loans that only need to be paid back once students are earning a decent wage, currently \$53,345.
5. Members of the Australian public are entitled to receive government assistance for higher education provided they meet the eligibility criteria outlined in the *Higher Education Support Act 2003*.
6. Members of the public, particularly potential students and their families, require access to information about this support in order to make informed decisions about higher education study.
7. It is particularly critical to provide this information now, as Australian Tertiary Admissions Rankings (ATAR) are announced in December, and universities will make main round offers to students in January 2015.
8. Proposed changes to the higher education system are outlined in the *Higher Education and Research Reform Amendment Bill 2014*. These reforms are the most significant changes to higher education in recent years.
9. The Bill is currently before the Parliament and is scheduled to be debated during the final sitting period of the year.
10. The main purpose of the Bill is to expand opportunities and choices for prospective and existing higher education students in Australia. It also aims to ensure that Australia is not left behind at a time of rising performance by universities around the world.
11. The Bill reforms higher education by deregulating fees and extending demand driven funding to higher education qualifications below the level of bachelor degree, including higher education diplomas, advanced diplomas, and associate degrees, and also to private universities and non-university higher education providers for the first time. The Bill will enable providers to determine the amount that students contribute to the cost of their courses.
12. These changes are expected to encourage innovation and competition among providers, and deliver greater choice and higher quality courses for students.
13. The Bill restructures Commonwealth subsidies for Commonwealth supported places to ensure a more equal sharing of costs between taxpayers and students.

Principle 2: Campaign materials should be presented in an objective, fair and accessible manner and be designed to meet the objectives of the campaign

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- Campaign materials should enable the recipients of the information to distinguish between facts, comment, opinion and analysis.
- Where information is presented as a fact, it should be accurate and verifiable. When making a factual comparison, the material should not attempt to mislead the recipient about the situation with which the comparison is made and it should state explicitly the basis for the comparison.
- Pre-existing policies, products, services and activities should not be presented as new.
- Special attention should be paid to communicating with any disadvantaged individuals or groups identified as being within the target audience. Particular attention should be paid to the communication needs of young people, the rural community and those for who English is not a convenient language in which to receive information.
- Imagery used in campaign materials should reflect the diverse range of Australians. There should be recognition of the full participation of women, Indigenous and culturally and linguistically diverse communities by realistically portraying their interests, lifestyles and contributions to Australian society.
- Campaign materials should be tested with target audiences to indicate they are engaging and perform well against the objectives of the campaign.

Please provide a statement against the points above to demonstrate and justify compliance with Principle 2.

1. Statements made in phase one of the 2014 higher education communication campaign are factual, and are based solely on existing legislation, proposed legislation changes (Budget announcement) and defensible analysis of the Australian higher education system.
2. Existing Government higher education products and services are not being presented as new. Campaign materials use phrases such as “continue to” and “stay” to make this clear.
3. Key messages for this phase of the campaign include:
 - a. HECS is here to stay
 - b. On average, university graduates earn 75% more over their lifetime than school leavers
 - c. Higher education can open up more career opportunities
 - d. The Government will continue to pay, on average, half of undergraduate higher education course fees
 - e. There are plans to extend fee subsidies to other higher education institutions.
4. All content for the communication campaign has been examined and verified by the policy area responsible for higher education reform.

Legislation

5. The *Higher Education Support Act 2003* provides the framework for the Australian Government’s support for higher education institutions and higher education students.

Proposed legislation

6. The *Higher Education and Research Reform Amendment Bill 2014* will make changes to the *Higher Education Support Act 2003* in the following ways:
 - Deregulate and expand the higher education demand driven system commencing from 1 January 2016 so that direct financial support will be available to students studying

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accredited higher education diplomas, advanced diplomas and associate degrees courses, as well as those studying bachelor degrees, at all approved non-university higher education providers

- Simplify HECS by merging HECs-HELP and FEE-HELP with students no longer having to pay fees to access FEE-HELP and VET FEE-HELP
- The establishment of a Commonwealth Scholarship Scheme to assist students from disadvantaged backgrounds
- Lend to students at a rate that reflects the cost of Government borrowings to fund their student loans, with a maximum rate of 6 per cent
- Rebalance the Commonwealth's contribution towards course fees for new students, with a reduction of 20 per cent on average, with effect from 1 January 2016
- Increase funding caps for the Australian Research Council, in particular for investment in Future Fellowships; exemption from fees for Research Training Scheme (RTS) students repealed from 1 January 2016 and new arrangements for tuition fees to generally apply to RTS students.
- Access to HELP for specific New Zealand citizens

See verification matrix for further detail relating to the factual evidence base for campaign messaging.

Other sources

7. Grattan Institute Report: *Graduate Winners: Assessing the public and private benefits of Higher Education* (August 2012)
8. Higher Education Base Funding Review Final Report (October 2011)

Special audiences

9. The planned campaign media strategy includes funding to address Indigenous and culturally and linguistically diverse (CALD) audiences. The department has worked with Mitchells Adcorp Alliance, the master media placement agency for the Australian Government to ensure the media buy reflects the communication needs of these audiences.

13. English digital, television and radio materials will be translated into nine languages for the benefit of culturally and linguistically diverse audiences. These languages will include Afghan, Arabic, Burmese, Cantonese, Mandarin, Iranian (Persian), Somali, Sudanese and Vietnamese.

15. As the primary target audience for this campaign is prospective students, the communication preferences of young people have been carefully considered.

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16. Paid advertising placements have been weighted towards the preferences of this target audience and will be complimented by strong digital and social media activity.
17. Media channels covering regional and rural Australia are included in the campaign.
18. To address accessibility issues, the department's website will be accessible to WCAG 2.0 AA guidelines (meaning campaign materials housed on the website will be accessible to people with disability) and all video material will be available with closed captions and scripts. Print handicapped radio has been included in the media buy for this campaign.
19. The creative concept for this campaign relies on animation and graphics so selection of talent and representation of special audiences is not considered an issue.

22. Materials were perceived to contain important, valuable and reassuring information.

Principle 3: Campaign materials should be objective and not directed at promoting party political interests

- Campaign materials must be objective and free of political argument.
- Campaign materials must not try to foster a positive impression of a particular political party or promote party political interests.

Campaign materials do not:

- mention the party in government by name;
- directly attack or scorn the views, policies or actions of others such as the policies and opinions of opposition parties or groups;
- include party-political slogans or images;
- influence public support for a political party, a candidate for election, a Minister or a Member of Parliament; or
- refer or link to the websites of politicians or political parties

Please provide a statement against the points above to demonstrate and justify compliance with Principle 3.

1. The 2014 higher education communication campaign presents messages in an objective manner. The language used is directly informed by market research and does not foster a positive impression of a particular political party or their interests.
2. Specific testing has been undertaken by ORIMA Research to ensure the material is not perceived as being political in nature.
3. The campaign materials provided for consideration do not:
 - a. mention the party in government by name

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- b. directly attack or scorn the views, policies or actions of others such as the policies and opinions of opposition parties or groups
 - c. include party-political slogans or images
 - d. influence public support for a political party, a candidate for election, a Minister or a Member of Parliament, or
 - e. refer or link to the websites of politicians or political parties.
4. The campaign tagline, “Your future is Australia’s future”, is not a party political slogan.
 5. Campaign material does not contain messages, images or voice-overs from Government Ministers or representatives.
 6. The website address for this campaign is www.highered.gov.au (although campaign materials feature australia.gov.au/HigherEd in line with campaign guidelines). This URL will point to a newly created campaign website featuring the campaign creative and advertising materials, along with further information about the higher education system and the Government’s proposed reforms.

Principle 4: Campaigns should be justified and undertaken in an efficient, effective and relevant manner

- Campaigns should only be instigated where a need is demonstrated, target recipients are clearly identified and the campaign is informed by appropriate research or evidence.
- Campaign information should clearly and directly affect the interest of recipients.
- The medium and volume of the advertising activities should be cost effective and justifiable within the budget allocated to the campaign.
- Distribution of unsolicited material should be carefully controlled.
- Campaigns should be evaluated to determine effectiveness.

Please provide a statement against the points above to demonstrate and justify compliance with Principle 4.

1. The Australian Government’s proposed reforms represent some of the most significant changes to higher education in recent years. In October 2014, the Department engaged ORIMA Research to undertake qualitative and quantitative research into knowledge of the higher education system and the Government’s proposed reforms.
5. This research reinforced anecdotal feedback received by departmental staff present at 45 higher education institution open days and career expos between July and September 2014.
6. A phased communication approach was recommended by developmental research to firstly dispel myths and misconceptions and secondly to provide information on the final shape of

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higher education reform.

8. The first phase of campaign advertising will run from 1 – 21 December 2014 and include television, digital, newspaper, radio and out-of-home advertising.
9. These channels have been chosen based on recommendations from the master media placement agency, Mitchells Adcorp Alliance, to ensure maximum reach and influence with the campaign's target audiences.
10. The timing of the campaign reflects the timing of ATAR notifications (December 2014) and announcement of university offers (January 2015).

15. In line with developmental research, the objectives of phase one of this campaign are to:
 - a. Increase target audience awareness and understanding of current Government assistance, resources and financial support for higher education
 - b. Counter myths and misconceptions about higher education and the reforms
 - c. Encourage audiences to seek further information about current Government resources, assistance and financial support for higher education, and
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19. The success of the campaign in meeting campaign objectives will be measured through tracking and evaluation research.
20. The department has engaged TNS Social Research to conduct benchmarking, tracking and evaluation research. Benchmarking research will begin the week commencing 24 November.
21. Tracking the effectiveness of the campaign is important to ensure that the department can develop or modify creative as the campaign progresses if necessary.
22. There will also be an overall evaluation of the campaign at its conclusion to determine its effectiveness. This evaluation will also include an analysis of website and call centre data.

Principle 5: Campaigns must comply with legal requirements and procurement policies and procedures

- The manner of presentation and the delivery of campaigns must comply with all relevant laws including:
 - a. laws with respect to broadcasting and media;
 - b. privacy laws;
 - c. intellectual property laws;
 - d. electoral laws;
 - e. trade practices and consumer protection laws; and
 - f. workplace relations laws.
- Procurement policies and procedures for the tendering and commissioning of services and the employment of consultants should be followed and there should be a clear audit trail regarding decision making.

Please provide a statement against the points above to demonstrate and justify compliance with Principle 5.

1. Departmental legal advice confirms phase one materials for the 2014 higher education communication campaign comply with relevant laws, including:
 - a. laws with respect to broadcast and media
 - b. privacy laws
 - c. intellectual property laws
 - d. electoral laws
 - e. trade practices and consumer protection laws, and
 - f. workplace relations laws.
2. Australian Government procurement guidelines were observed in the tendering and commissioning of services and the employment of consultants for the campaign.
3. A total of five contracts will be let covering:
 - a. creative
 - b. concept testing and refinement research
 - c. benchmarking, tracking and evaluation research
 - d. public relations, and
 - e. website development

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4. Agencies were sourced from the whole of Government Communication Multi-Use-List, as recommended by the Communication Advice Branch, Department of Finance.
5. ORIMA Research was sole sourced for creative testing and refinement research contract for this campaign. Having conducted developmental research for the campaign in tight timeframes they had the knowledge and background to undertake creative testing and refinement research.
6. ORIMA Research had also demonstrated, through the request for quote process for the developmental research contract, that they had vast experience in conducting concept testing and refinement research in tight timeframes.
7. All decisions and advice in relation to the tendering and awarding of contracts for this campaign have been documented.

I have reviewed and approve this Statement of Compliance for submission.

Signature

Jessie Borthwick

A/g Deputy Secretary

Department of Education

25 November 2014